

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

----- x  
UNITED STATES OF AMERICA, :  
  
Plaintiff, : Criminal Action  
No. 19-10080-NMG  
  
v. :  
  
GREGORY COLBURN, et al., :  
  
Defendants. :  
----- x

**DEFENDANTS GAMAL ABDELAZIZ [DEF. NO. 4], MARCI PALATELLA  
[DEF. NO. 16], AND JOHN WILSON [DEF. NO. 17]  
OBJECTIONS TO THE GOVERNMENT’S WITNESS LIST**

Pursuant to the Court’s August 9, 2021 Order (Dkt No. 2054), Defendants Gamal Abdelaziz [Def. No. 4], Marci Palatella [Def. No. 16], and John Wilson [Def. No. 17] (“Defendants”) object to the following individuals on the Government’s witness list.

Defendants object to Andrew Jezierski,<sup>1</sup> Ali Khosroshahin,<sup>2</sup> Margaret Lysy<sup>3</sup>, Lindsey Munday,<sup>4</sup> Gregg Murray<sup>5</sup>, and Caryl Smith Gilbert.<sup>6</sup> These individuals are solely associated with two individuals who were defendants in this case at the time the witness lists were filed but have since pled guilty, Elisabeth Kimmel and Homayoun Zadeh. Witnesses which relate solely to the Kimmel and Zadeh cases should not be called at trial.

---

<sup>1</sup> Mr. Jezierski was a counselor for the child of Elisabeth Kimmel.

<sup>2</sup> Mr. Khosroshahin was a soccer coach at USC. None of the Defendants are alleged to have a child who was presented to USC as a potential soccer recruit.

<sup>3</sup> Ms. Lysy worked at Georgetown. There are no allegations against the Defendants that relate to Georgetown.

<sup>4</sup> Ms. Mundy is a lacrosse coach at USC. None of the Defendants are alleged to have a child who was presented to USC as a potential lacrosse recruit.

<sup>5</sup> Mr. Murray was a guidance counselor for the child of Homayoun Zadeh.

<sup>6</sup> Ms. Gilbert is a track and field coach at USC. None of the Defendants are alleged to have a child who was presented to USC as a potential track and field recruit.

Defendants further object to the testimony of Bruce Isackson and Davina Isackson. The Isacksons are former clients of Rick Singer who have pled guilty. Their testimony should be excluded because the Isacksons had no personal interactions with the Defendants as it relates to the issues in this case and the Government lacks sufficient evidence to prove a single conspiracy. *See also* Defendants' Motion in Limine to Require the Government to Proffer its Corroborating Evidence of the Alleged Conspiracy Under *Petrozziello* (Dkt. No. 1990); Defendants' Motion in Limine to Exclude Evidence Pertaining to Defendants who Pled Guilty (Dkt. No. 1997).

Defendant Gamal Abdelaziz further objects to Nitya Velakacharla for the reasons stated in his Motion in Limine to Limit Testimony of Nitya Velakacharla (Dkt. No. 2000).

Additionally, Defendants do not waive any objections they may have at trial based on any witness's testimony or their right to further object to the witnesses already disclosed by the Government and any additional witnesses which the Government may seek to call at trial.

Dated: August 12, 2021  
Boston, Massachusetts

Respectfully submitted,

/s/ Brian T. Kelly

Brian T. Kelly (BBO # 549566)  
Joshua C. Sharp (BBO # 681439)  
Lauren M. Maynard (BBO # 698742)  
NIXON PEABODY LLP  
53 State Street  
Boston, MA 02109  
(617) 345-1000  
bkelly@nixonpeabody.com  
jsharp@nixonpeabody.com  
lmaynard@nixonpeabody.com

Robert Sheketoff (BBO # 457340)  
One McKinley Square  
Boston, MA 02109  
617-367-3449

*Counsel for Gamal Abdelaziz*

/s/ Michael K. Loucks

Michael K. Loucks (BBO # 305520)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
500 Boylston Street  
Boston, MA 02116  
(617) 573-4800  
michael.loucks@skadden.com

Jack P. DiCanio (*pro hac vice*)  
Emily Reitmeier (*pro hac vice*)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
525 University Avenue  
Palo Alto, CA 94301  
(650) 470-4500  
jack.dicanio@skadden.com  
emily.reitmeier@skadden.com

*Counsel for Marci Palatella*

/s/ Michael Kendall

Michael Kendall (BBO # 544866)  
Lauren M. Papenhausen (BBO # 655527)  
WHITE & CASE LLP  
75 State Street  
Boston, MA 02109-1814  
(617) 979-9300  
michael.kendall@whitecase.com  
lauren.papenhausen@whitecase.com

Andrew E. Tomback (*pro hac vice*)  
MCLAUGHLIN & STERN, LLP  
260 Madison Avenue  
New York, NY 10016  
(212) 448-1100  
atomback@mclaughlinstern.com

*Counsel for John Wilson*

**CERTIFICATE OF SERVICE**

I, Michael K. Loucks, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants, if any, on August 12, 2021.

Dated: August 12, 2021      /s/ Michael K. Loucks  
Michael K. Loucks